

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

IN RE: DEALER MANAGEMENT SYSTEMS  
ANTITRUST LITIGATION

MDL No. 2817  
Case No. 1:18-CV-00864

*This Document Relates To:*

Hon. Robert M. Dow, Jr.

i3 Brands, Inc. et al. v. CDK Global, LLC, et al.,  
No. 1:19-CV-01412

**MOTION FOR LEAVE TO FILE UNDER SEAL**

Plaintiffs i3 Brands, Inc. and PartProtection, LLC, by their undersigned attorneys, hereby request leave to file their First Amended Complaint (“FAC”), under seal. In their FAC, Plaintiffs assert allegations that reflect the terms of particular contracts between Plaintiffs and Defendants (attached as exhibits to Plaintiffs’ complaint). Under those agreements, Plaintiffs agreed that they would maintain the confidentiality of the contractual terms and would not disclose them to third parties. Plaintiffs therefore request leave to file their FAC under seal in accordance with the Second Amended Agreed Confidentiality Order. Plaintiffs will also file a public, redacted version of the FAC.

Dated: Nov. 25, 2019

Respectfully submitted,

/s/ Michael E. Bloom

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J. Erik Connolly

Michael E. Bloom

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PartProtection, LLC*

**CERTIFICATE OF SERVICE**

Michael E. Bloom, an attorney, hereby certifies that on November 25, 2019, he caused a true and correct copy of the foregoing **MOTION FOR LEAVE TO FILE UNDER SEAL** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system.

/s/ Michael E. Bloom